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Ref: **8/6/34**
Enq: **K RAUBENHEIMER**

29 November 2016

The Chief Executive Officer
The South African Heritage Resources Agency
P.O. Box 4637
CAPE TOWN
8000

Sir

PROPOSED TOWNSHIP ESTABLISHMENT: ALABAMA EXTENSION 6 ON A PORTION OF THE REMAINING EXTENT OF PORTION 1 OF THE FARM TOWNLANDS OF KLERKSDORP NO. 424-IP

With reference to the interim comments received from your organization in respect of the proposed township Alabama Extension 6 (your letter CaseID 10026 dated 20 October 2016 refers), please find attached herewith the revised Phase 1 Cultural Heritage Resources Impact Assessment compiled by African Heritage Consultants in respect of the entire development area included in the Environmental Impact Assessment, as requested.

With reference to the requirement in respect of the conducting of a Palaeontological Desktop Study, we wish to draw your attention to the fact that Maxim Planning Solutions (Pty) Ltd recently also attended to the establishment of the township areas of Alabama Extensions 4 and 5. In terms of the fore-mentioned township areas, same are also underlain by exactly the same geological formations as those encountered on the proposed township area of Alabama Extension 6, i.e. Kameeldoorns Formation and the Rietgat Formation. During the establishment of the township areas of Alabama Extension 4 and 5, SAHRA required that a Palaeontological Desktop Study be commissioned due to the underlying geological formation. Maxim Planning Solutions (Pty) Ltd commissioned Professor Bruce Rubidge to conduct the requested Palaeontological Desktop Study. Professor Rubidge concluded in this study as follows:

“As the rocks of the Precambrian Ventersdorp Supergroup are of igneous origin there is no possibility of fossils being present. The geological map does not indicate the presence of alluvial deposits, and although the study area is covered by grassveld it has been affected by agricultural development.

RECOMMENDATION

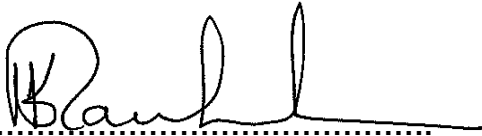
In my opinion this development will not negatively affect palaeontological heritage and suggest that, from a paleontological perspective, this development should proceed. If, in the extremely unlikely event that fossils are exposed in possible overlying unconsolidated Quaternary deposits, it will create a unique opportunity to explore the area for fossils.”

The proposed township areas of Alabama Extensions 4 and 5 are located only 500m west of the proposed township area of Alabama Extension 6 and the geological map of the area clearly indicates that it is underlain by the same geological formation as found in the township areas of Alabama Extensions 4 and 5. In view of the fore-mentioned and the conclusions reached by Professor Bruce Rubidge in his Palaeontological Desktop Study on the nearby township areas of Alabama Extensions 4 and 5, we hereby wish to enquire whether this Palaeontological Desktop Study will also suffice for this development as we are of the opinion that the commissioning of another Palaeontological Desktop Study will reach exactly the same conclusion as that reached during the Palaeontological Desktop Study conducted in respect of the township areas of Alabama Extension 4 and 5 which are underlain by exactly the same geological formation. In our view it will constitute a wastage of resources to commission a desktop study that will reach the same conclusion as a study already conducted in the same proximity. For ease of reference we will also upload a copy of the Palaeontological Desktop Study that was conducted by Professor Bruce Rubidge.

In terms of your interim comment we have also uploaded a new kml file representing the entire area included in the BAR.

Please do not hesitate to contact us should any additional information or clarification be required.

Yours faithfully

A handwritten signature in black ink, appearing to read 'K. Raubheimer', written over a horizontal dotted line.

K. RAUBENHEIMER
Pr. PIn A/924/1996